

**EPSTEIN DRANGEL LLP**

60 East 42nd Street, Suite 1250, New York, NY 10165

T: 212.292.5390 • E: mail@ipcounselors.com

www.ipcounselors.com

August 23, 2024

VIA ECF & FACSIMILE (212-805-7942)

Honorable Alvin K. Hellerstein

United States District Court

Southern District of New York

500 Pearl Street, Room 1050

New York, NY 10007

Re: *Hachette Filipacchi Presse v. Prestige International Group LLC*, Civil Action
 No. 1:23-cv-04777-AKH
 Letter Requesting Extension of Time to File Default Judgment Motion

Dear Judge Hellerstein:

We represent Plaintiff Hachette Filipacchi Presse ("Plaintiff") in the above-captioned case, and are writing, pursuant to Your Honor's Individual Rule 1(D), to request a further extension of sixty (60) days to file any default judgment motion against Defendant Prestige International Group LLC ("Defendant") (i.e., from August 28, 2024, up to and including October 28, 2024). Plaintiff and Defendant, through their counsel, have reached an agreement in principle to resolve this matter, and are currently negotiating the terms of a written settlement agreement. Therefore, to permit the parties further time to finalize and execute a written agreement, and to conserve the time and resources of the parties, as well as this Court, Plaintiff hereby respectfully submits that a further sixty (60) day extension of its time to file for any default judgment is warranted.

In a letter dated October 5, 2023, Plaintiff initially advised the Court that it would move for a default judgment against Defendant by January 3, 2024. *Dkt. No. 14*. Since Plaintiff's counsel had been corresponding with Defendant in an attempt to resolve the case, Plaintiff requested an extension of time to file for a default judgment until March 1, 2024, which was granted by the Court. *Dkt. Nos. 16-17*. In light of Plaintiff's continued efforts to discuss the case with Defendant, Plaintiff sought a second extension of time to file for a default judgment until April 30, 2024, which was likewise granted by the Court. *Dkt. Nos. 18-19*. Similarly, in an effort to gain contact with Defendant, which had become unresponsive, Plaintiff requested a third extension of time to file for a default judgment until July 29, 2024, which was again granted by the Court. *Dkt. Nos. 20-21*. On or about July 1, 2024, Plaintiff gained contact with Defendant and has since been engaged in active settlement discussions. Given this, Plaintiff requested a fourth extension of time to file for default judgment until August 28, 2024, which was granted by the Court. *Dkt. Nos. 22-23*. The instant request is Plaintiff's fifth request for an extension; and, as noted herein, all of its prior extension requests have been granted. Plaintiff also previously filed one adjournment request regarding the initial pretrial conference, which was granted. Defendant is in default (*see Dkt. No.*

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13) and therefore, Plaintiff has not conferred with Defendant regarding this request. No schedule has been entered in this case, and as such, no other deadlines will be impacted by the proposed extension.

We thank the Court for its time and consideration.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: s/ Kerry B. Brownlee

Kerry B. Brownlee (KB 0823)

kbrownlee@ipcounselors.com

60 East 42nd Street, Suite 1250

New York, NY 10165

Telephone: (212) 292-5390

Facsimile: (212) 292-5391

Attorneys for Hachette Filipacchi Presse

